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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT TACOMA

11 In Re:

12 DMCA SUBPOENA TO CLOUDFLARE,
13 INC.,

14 Service Provider.

Case No.:

DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA TO
CLOUDFLARE, INC.

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DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA
TO CLOUDFLARE, INC. - 1

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

1 I, ANIS BABA, hereby declare as follows:

2 1. I am the Director of MG Premium Ltd (hereinafter, "MG") and am authorized to
3 act on its behalf. I have personal knowledge of the facts contained herein and, if called upon to
4 do so, could and would testify competently thereto.

5 2. I submit this declaration in support of MG's request for issuance of a Subpoena
6 by the Clerk of this Court, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17
7 U.S.C. § 512(h) to Cloudflare, Inc. ("Cloudflare"), relating to the posting of MG's copyrighted
8 material on the domain, porndead.com, webpages hosted by Cloudflare.

9 3. I have personal knowledge of the copyrights owned by MG and the ongoing
10 infringements of those copyrights that occur on the internet. I also have personal knowledge of
11 the countless instances that MG's copyrighted works have been posted without MG authorization
12 to porndead.com.

13 4. On July 13, 2020, authorized agent for MG Jason Tucker issued and served a
14 copyright infringement notification on Cloudflare's DMCA Agent relating to posts on
15 porndead.com. Pursuant to Section 512(c)(3)(A), the notification was properly signed by MG's
16 agent, identified the copyrighted material being infringed, set forth a listing of the 400 URLs
17 containing posts of infringing material, confirmed that such use of MG's copyrighted works was
18 not authorized by MG, and gave contact information such that the DMCA Agent could reach him
19 with questions. A true and correct copy of the July 13, 2020 notifications are attached as Exhibit
20 A.

21 4. The purpose of the DMCA Subpoena is to obtain information sufficient to
22 identify alleged infringers who, without authorization from MG, posted material to the webpage
23 porndead.com, which infringed copyrights held by MG. The information received as a result of
24 the Subpoena will only be used by MG to protect its rights under Title 17 of the United States
25 Code.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 DATED this 14 day of July, 2020, at Nicosia, Cyprus.

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6
7 ANIS BABA
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Exhibit A
Copies of Notifications Issued Pursuant to
17 U.S.C. § 512(c)(3) to
Registered DMCA Agent for
Service Provider Cloudflare, Inc.

Jason Tucker

From: Jason Tucker [REDACTED]
Sent: Monday, July 13, 2020 12:53 PM
To: abuse@cloudflare.com
Subject: DMCA Takedown Notice for Copyright Infringement – MG/Brazzers – 200 Links

via Email:

RE: DMCA Takedown Notice for Copyright Infringement – MG/Brazzers – 200 Links

Dear Copyright Agent,

I, Jason Tucker, hereby declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge and belief the following is true and correct and I have the authority to act on behalf of the owner of the copyrights involved.

I have a good faith belief that the use of materials identified below is not authorized by the Owner and therefore infringes on its rights pursuant to Copyright Law. Pursuant to this notification, you should immediately take steps to locate and remove and/or disable access to the content that is on your system.

If you are a service provider, you may otherwise be liable for copyright infringement if, upon obtaining knowledge or awareness of infringing material being stored upon your network, you do not act expeditiously to remove, or disable access to, the material.

My contact information is as follows:

MG Premium Ltd.

c/o: Battleship Stance, Inc. - Jason Tucker

Address: [REDACTED]

Email: [REDACTED]

Location of original works owned by and registered to MG Premium Ltd: <http://www.brazzers.com>

This correspondence and all of its contents is without prejudice to MG Premium Ltd. or any of their affiliated company's rights and remedies, all of which are expressly reserved.

Sincerely,

s/Jason Tucker

Jason Tucker

Agent for MG Premium Ltd.; MG Limited Cyprus; MG Content DP Ltd; MG Content RK Limited; MG Freesites Ltd

Links to Infringing Material that we request be REMOVED:

<https://porndead.com/movie/1135547892/x>

<https://porndead.com/movie/1252489062/x>

<https://porndead.com/movie/1630613845/x>

<https://porndead.com/movie/1798937388/x>
<https://porndead.com/movie/1813110259/x>
<https://porndead.com/movie/1860144401/x>
<https://porndead.com/movie/1874933654/x>
<https://porndead.com/movie/226518554/x>
<https://porndead.com/movie/2b34f7e60bff23887c4e/x>
<https://porndead.com/movie/441371706/x>
<https://porndead.com/movie/473474759/x>
<https://porndead.com/movie/667351302/x>
<https://porndead.com/movie/90c5c2806948edf58db7/x>
<https://porndead.com/movie/940245560/x>
<https://porndead.com/movie/960542483/x>
<https://porndead.com/movie/ph55afaf5501e9b/x>
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<https://porndead.com/movie/ph561971aea5c0e/x>
<https://porndead.com/movie/ph56228848e975a/x>
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<https://porndead.com/movie/ph5665f596502ab/x>
<https://porndead.com/movie/ph5666c226b8ceb/x>
<https://porndead.com/movie/ph56eabaf38516/x>
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<https://porndead.com/movie/ph57ffaade0a2aa/x>
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<https://porndead.com/movie/ph584eee20dd022/x>
<https://porndead.com/movie/ph5854bd848faa5/x>
<https://porndead.com/movie/ph5854bedf89f6d/x>
<https://porndead.com/movie/ph586055aaf0147/x>
<https://porndead.com/movie/ph58a5d9f4d3151/x>
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<https://porndead.com/movie/ph58c6f5a2803e0/x>
<https://porndead.com/movie/ph58e64f2d0e51b/x>
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<https://porndead.com/movie/ph59555bcebb185/x>
<https://porndead.com/movie/ph5961998240bbb/x>
<https://porndead.com/movie/ph5968d98ba0c02/x>
<https://porndead.com/movie/ph59721b429ef82/x>
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<https://porndead.com/movie/ph59b06a571d690/x>
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<https://porndead.com/movie/ph5b431416a57a4/x>

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<https://porndead.com/movie/ph5eb881eba6481/x>
<https://porndead.com/movie/ph5ebe0ee8656e2/x>
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<https://porndead.com/movie/ph5ecd6eef5c57c/x>
<https://porndead.com/movie/ph5ece41e8da1fb/x>
<https://porndead.com/movie/ph5ecec4d824406/x>
<https://porndead.com/movie/ph5eced4be8034c/x>
<https://porndead.com/movie/ph5ecfadee5b91c/x>
<https://porndead.com/movie/ph5ed043d13c58c/x>
<https://porndead.com/movie/ph5ed0e41ccbcec/x>
<https://porndead.com/movie/ph5ed1b1d154594/x>
<https://porndead.com/movie/ph5ed1b33d00828/x>
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<https://porndead.com/movie/ph5ed2d6b773d98/x>
<https://porndead.com/movie/ph5ed334a221cec/x>
<https://porndead.com/movie/ph5ed33838e6ccf/x>
<https://porndead.com/movie/ph5ed3399743075/x>

Jason Tucker

SKYPE: [REDACTED]

Twitter: [REDACTED]

The email you have received from this company and individual and any file attachments(s) are confidential and intended solely for use by the identified recipient(s). If you received this message in error, please notify the sender and delete the message and any copies completely from your computer. Distribution or copying of this communication, in whole or in part, by any unauthorized recipient is prohibited and may subject you to liability. All rights reserved.

Jason Tucker

From: Jason Tucker [REDACTED]
Sent: Monday, July 13, 2020 12:52 PM
To: abuse@cloudflare.com
Subject: DMCA Takedown Notice for Copyright Infringement – MG/RK – 200 Links

via Email:

RE: DMCA Takedown Notice for Copyright Infringement – MG/RK – 200 Links

Dear Copyright Agent,

I, Jason Tucker, hereby declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge and belief the following is true and correct and I have the authority to act on behalf of the owner of the copyrights involved.

I have a good faith belief that the use of materials identified below is not authorized by the Owner and therefore infringes on its rights pursuant to Copyright Law. Pursuant to this notification, you should immediately take steps to locate and remove and/or disable access to the content that is on your system.

If you are a service provider, you may otherwise be liable for copyright infringement if, upon obtaining knowledge or awareness of infringing material being stored upon your network, you do not act expeditiously to remove, or disable access to, the material.

My contact information is as follows:

MG Premium Ltd.

c/o: Battleship Stance, Inc. - Jason Tucker

Address: [REDACTED]

Email: [REDACTED]

Location of original works owned by and registered to MG Premium Ltd: <http://www.realitykings.com>

This correspondence and all of its contents is without prejudice to MG Premium Ltd. or any of their affiliated company's rights and remedies, all of which are expressly reserved.

Sincerely,

s/Jason Tucker

Jason Tucker

Agent for MG Premium Ltd.; MG Limited Cyprus; MG Content DP Ltd; MG Content RK Limited; MG Freesites Ltd

Links to Infringing Material that we request be REMOVED:

<https://porndead.com/movie/1006539276/x>

<https://porndead.com/movie/1059071406/x>

<https://porndead.com/movie/116495537/x>

<https://porndead.com/movie/1167961647/x>
<https://porndead.com/movie/1183170957/x>
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<https://porndead.com/movie/1362114311/x>
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